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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 PATRICIA WEEKS, ALICIA HELMS, BRIAN  
21 MCCLOY, and ADRIAN ALCARAZ on behalf  
22 of themselves and all others similarly situated,

23 Plaintiffs,

24 v.

25 GOOGLE LLC,

26 Defendant.

27 Case No. 5:18-CV-00801-NC

28 **POST-DISTRIBUTION ACCOUNTING**

Date: N/A

Time: N/A

Courtroom: 5, 4th Floor

Judge: Hon. Nathanael Cousins

1 Pursuant to the Court's December 13, 2019 Order Granting Plaintiffs' Motion for Final  
 2 Settlement Approval and Attorneys' Fees and Entering Judgment (Dkt. No. 184), and in  
 3 accordance with the Northern District of California's Procedural Guidance for Class Action  
 4 Settlements, Plaintiffs submit this status update and preliminary post-distribution accounting.

5 **Status of Distribution**

6 The Court granted final approval of this settlement on December 13, 2019. Dkt. No. 184.  
 7 Under the settlement agreement, the Effective Date of the settlement was January 13, 2020, and  
 8 distribution of payments to class members began on February 12. The Claims Administrator,  
 9 KCC, distributed payment to 22,732 class members on February 12. Declaration of Orlando  
 10 Castillejos ("Castillejos Decl"), ¶ 13. These claims had no deficiencies and were approved  
 11 without requiring any additional follow-up with the claimants. *Id.* ¶ 14. The total amount of  
 12 these payments was \$2,356,533. *Id.* ¶ 13. In addition, 18,598 class members submitted deficient  
 13 claims (e.g., claims without sufficient supporting documentation). *Id.* ¶ 11. In line with the terms  
 14 of the settlement agreement, KCC sent deficiency notices to these class members and provided  
 15 them an opportunity to cure. *Id.* The deadline to cure deficiencies was February 28. *Id.* 7,855  
 16 class members cured the deficiencies in their claims, and KCC is now preparing to distribute  
 17 settlement checks to these class members on March 27, 2020. Within 21 days of that final  
 18 distribution, Plaintiffs will file an updated post-distribution accounting. Plaintiffs will further  
 19 update the Court concerning payment of late-filed claims.

20 **Accounting Per the Procedural Guidelines**

21 The following chart summarizes the distribution of settlement funds to date and other  
 22 accounting information pursuant to the provisions for post-distribution accounting in the Northern  
 23 District's Procedural Guidance for Class Action Settlements. Plaintiffs will file an updated post-  
 24 distribution accounting on April 17, 2020.

Total Settlement Fund	\$7,250,000	
Total Number of Class Members	800,000	
Total Class Members to Whom Notice was Sent and Not Returned as Undeliverable	596,361	

Method(s) of Notice Sent	Email and Mail	
Claim Forms Submitted	41,969	5.25%
Opt Outs	129	.02%
Objections	0	0%
Approved Claims	30,617	73%
Recovery per Claimant		
Average	\$92.50	
Median	\$20	
Amounts Paid to Class Members		
Largest Amount	\$500	
Smallest Amount	\$20	
Method(s) of Payments	Check, PayPal, Zelle, ACH	
Checks Not Cashed	5,901	\$ 531,194
Attorneys' Fees & Costs	\$2,175,000	30%
Attorneys' Fees Multiplier	0.67	
Incentive Award (4 class reps)	\$20,000	
Administration Fees	\$148,349.26	
Amounts Distributed to Each Cy Pres Recipient	None at this time	

15 Dated: March 4, 2020

16 Respectfully submitted,

17 **GIRARD SHARP LLP**18 /s/ Simon S. Grille

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10 *Class Counsel*

**CERTIFICATE OF SERVICE**

I, Simon S. Grille, hereby certify that on March 4, 2020, I caused the foregoing to be electronically filed using the Court's CM/ECF system, thereby causing it to be served upon all registered ECF users in this case.

Dated: March 4, 2020

/s/ Simon S. Grille

Simon S. Grille